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8 UNITED STATES DISTRICT COURT
9 DISTRICT OF NEVADA
10

11 JOHN MEGGS, Individually,
12 Plaintiff,

13 vs.

14 ANNA LUFTI, Individually, ANTON LUFTI,
Individually, AMIN LUFTI, Individually, and
15 CLARA LUFTI, Individually, doing business
as Church's Chicken,
16 Defendants.
17

CASE NO. 2:17-cv-01377-APG-GWF

**STIPULATION AND ORDER TO
EXTEND DISCOVERY AND OTHER
DEADLINES
(FIRST REQUEST)**

18 Pursuant to LR 26-4, the parties hereby stipulate and request this Court to amend the
19 Scheduling Order by extending existing deadlines. In support of this Stipulation and Request, the
20 parties state as follows:

- 21 1. Plaintiff filed his Amended Complaint on August 2, 2017.
- 22 2. On March 6, 2018, Defendants filed their Answer to Plaintiff's Amended Complaint.
- 23 3. On April 20, 2018, the parties prepared and filed their Proposed Discovery Plan and
24 Scheduling Order. The current discovery cut-off date is September 3, 2018.
- 25 4. The parties exchanged initial disclosures pursuant to Rule 26(a)(1) on February 22,
26 2018 and April 27, 2018.
- 27 5. Plaintiff propounded written discovery requests on May 3, 2018. Defendants are in the
28 process of preparing responding to those requests and has requested additional time.

6. The parties are attempting to engage in settlement discussions to avoid unnecessary further costs of litigation.

DISCOVERY REMAINING

If the parties are unable to arrive at an appropriate resolution of this matter on their own, written discovery, site inspections and possibly depositions will go forward as follows:

Defendant's responses to Plaintiff's outstanding written discovery requests will be due on or before June 22, 2018.

The Rule 34 site inspection currently set for June 25th will be go forward on July 16, 2018.

The parties reserve the right to conduct depositions and any additional necessary discovery through the extended discovery deadline. This Request for an extension of time is not sought for any improper purpose or other purpose of delay. Rather, it is sought by the parties solely for the purpose of allowing sufficient time to attempt to resolve this matter and, if that cannot be accomplished, to finish conducting all necessary and appropriate discovery within the extended discovery period.

WHY REMAINING DISCOVERY HAS NOT BEEN COMPLETED

The parties are currently in ongoing negotiations to attempt to resolve this matter and believe the additional time request will allow for further good faith effort to settle the claims. The additional requested time will allow Plaintiff and Defendants to review discovery responses and prepare for either depositions or settlement if settlement negotiations are unsuccessful.

SHOWING OF GOOD CAUSE

Pursuant to LR 26-4,

A motion or stipulation to extend a deadline set forth in a discovery plan must be received by the court no later than 21 days before the expiration of the subject deadline. A request made within 21 days of the subject deadline must be supported by a showing of good cause. A request made after the expiration of the subject deadline will not be granted unless the movant also demonstrates that the failure to act was the result of excusable neglect.

This request is timely as the discovery cut-off is currently set for September 3, 2018. In light of these circumstances, the parties require additional time to complete discovery. The following is a list of the current discovery deadlines and the parties' proposed extended deadlines.

Scheduled Event	Current Deadline	Proposed New Deadline
Expert Witness Disclosure	July 5, 2018	August 5, 2018
Joint Interim Status Report	July 5, 2018	August 5, 2018
Discovery Cut-off	September 3, 2018	October 5, 2018
Dispositive Motion	October 3, 2018	November 7, 2018
Pretrial Order	November 2, 2018	December 3, 2018

APPROVED AS TO FORM AND CONTENT.

DATED this 11th day of June, 2018.

DATED this 11th day of June, 2018.

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P.A.

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ORDER

IT IS SO ORDERED:

UNITED STATES MAGISTRATE JUDGE

DATED: 6/12/2018